## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

INGENIERIA ESTRELLA, S.A.

Plaintiff.

- vs. -

PATRICK MORISSEAU and LE TRANSPORTEUR, LLC

Defendants.

2:14 CV 1463(JS/ARL)

FILED

Civ. No.: CV INGLERK'S OFFICE

MAR 2 8 2014 \*

BROOKLYN OFFICE

## DEFENDANTS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE THEIR RESPONSE TO PLAINTIFFS' COMPLAINT

My name is Patrick Morisseau and I am the CEO of LeTransporteur, LLC and I am respectfully requesting an extension of time to respond to Plaintiffs' Complaint. Plaintiff filed this lawsuit on March 5, 2014. I received a copy of the Complaint and Summons on March 7, 2014. Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A)(i), Defendants' Answer or other response to the Complaint is currently due on March 31, 2014.

Defendants seek an additional sixty days, through May 31, 2014, to file their answer or other response. The request for an extension of time is supported by good cause. This extension is necessary to allow Defendants to seek and retain counsel to defend this litigation

- 1. On March 26, 2014, I contacted Plaintiff's counsel to inform him that I am filing this motion. He indicated that he does not oppose this motion.
- 2. Although the additional sixty (60) days would cause a short delay in responding to the Complaint, Plaintiff should suffer no prejudice by virtue of this extension of time.

WHEREFORE Defendants respectfully request that the Court grant this motion for an

extension of time until May 31, 2014, to file their answer or other response to Plaintiff's

Complaint.

Date: March 27, 2014

Patrick Morisseau pro se CEO of Le Transporteur, LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 27<sup>st</sup> day of March, 2014, a true and correct copy of the Defendants' Motion for Extension of Time was served on Defendants' Counsel by US Mail Express mail to: Bertrand Madsen, Esq Madsen Law P.C 111Broadway, 13th Floor, Suite 1305 New York, NY 10006

Patrick Morisseau pro se CEO of Le Transporteur, LLC

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	,
INGENIERIA ESTRELLA, S.A.  Plaintiff,	Civ. No.: CV 14 - 1463
- vs	
PATRICK MORISSEAU and LE TRANSPORTEUR LLC	
Defendants.	i
[PROPOSED] ORDER	
UPON CONSIDERATION of the Defendants' Unopposed Motion for Extension of Time	
to Respond to Plaintiff's Complaint, it is hereby	
ORDERED that the Motion is GRANTED, and that Defendants' Response is due on May	
31, 2014.	
SO ORDERED.	
Date United States District Judg	ge